

COPY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**William and Maureen Anello
362 Alba Court
West Grove, PA 19390
Chester County, Pennsylvania**

*
*
*
*
*
*

Plaintiffs

Civil Action No. 07-668-LPS

*

v.

*

*

**Indian River School District
Serve On:
Susan S. Bunting (officially)
31 Hoosier St.
Selbyville, DE 19975
Sussex County, Delaware
and
Susan S. Bunting (officially)
Superintendent of Schools
Indian River School District**

*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*

Defendants

*

PLAINTIFF'S INITIAL DISCLOSURES

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs William and Maureen Anello make these initial disclosures. These disclosures are based on the information reasonably available to Plaintiffs at this time and represent a good faith effort to identify the information required by Rule 26(a)(1). Plaintiffs reserve the right to supplement the information disclosed below if additional information becomes available.

These disclosures are not intended as a waiver of any objection to the production, use, or admission into evidence of any document or information that Plaintiffs may be

entitled to assert during discovery or during trial of this action. Plaintiffs reserve the right to objections including those based on relevancy, work-product doctrine, privilege, undue burden, materiality, admissibility, or any other valid objection. Plaintiffs reserve the right to object on any and all proper grounds to any other discovery request involving the subject matter of these disclosures.

These disclosures are made subject to the objections and qualifications listed above.

A) Individuals likely to have discoverable information.

The following individuals are likely to have discoverable information and may be contacted through counsel of Defendant Indian River School District, in accordance with the information provided in Defendant's initial disclosures.

1. Charles Rechsteiner
2. Connie Warner

Plaintiff reserves the right to identify and call any witness noted by Defendants, Indian River School District as having discoverable information.

B) A description by category of documents, data compilations, and tangible things that may be used to support Plaintiffs' claims or defenses.

Plaintiffs identify G.A.'s educational records, the official record of the Due Process Hearing and other documents produced during the course of the Due Process Hearing.

C) A computation of damages claimed by Plaintiffs.

Plaintiffs disclose the following damages for 2003-2004 and the 2004-2005 school years:

1. Sylvan Learning Center Expenses including Evaluations, Tutorials, and Transportation \$2,135.00 .
2. Easter Seals Occupational Therapy Expenses including Evaluations, Therapy and Transportation \$1,191.00
3. Tutoring Services from Jessica Norwacki \$250.00
4. Tuition for The Lighthouse Christian School \$2,930.00
5. Reasonable costs and legal expenses to be determined.

D) Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action.

Plaintiffs disclose that there is no such applicable insurance policy.

Dated: June 6, 2008

Respectfully Submitted,



**William Anello
362 Alba Court
West Grove, PA 19390**



**Maureen Anello
362 Alba Court
West Grove, PA 19390**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**William and Maureen Anello
362 Alba Court
West Grove, PA 19390
Chester County, Pennsylvania**

*
*
*
*
*

Civil Action No. 07-668-LPS

Plaintiffs

*

v.

*

*

**Indian River School District
Serve On:
Susan S. Bunting (officially)
31 Hoosier St.
Selbyville, DE 19975
Sussex County, Delaware
and
Susan S. Bunting (officially)
Superintendent of Schools
Indian River School District**

*
*
*
*
*
*
*
*
*
*
*
*

Defendants

*

NOTICE OF SERVICE

We, William and Maureen Anello, hereby certify that on June 6, 2008, we caused a true and correct copy of the Rule 26(a)(1) Initial Plaintiff Disclosures to be served upon the following counsel of record:

James H McMacken III
Morris, James LLP
500 Delaware Avenue, Suite 1500
PO Box 2306
Wilmington, DE 19899-2306

PLAINTIFFS
William Anello

William Anello
362 Alba Court
West Grove, PA 19390
Chester County, Pennsylvania

Maureen Anello

Maureen Anello
362 Alba Court
West Grove, PA 19390
Chester County, Pennsylvania

Dated: June 2, 2008